

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	Chapter 11
Stream TV Networks, Inc., <i>et</i>	)	Bankruptcy No. 23-10763 (DJB)
<i>al.</i>	)	
Debtors.	)	
William A. Homony, in his	)	
Capacity as Chapter 11	)	
Trustee of the Bankruptcy	)	
Estates of Stream TV	)	
Networks, Inc.	)	Adv. No. 25-00138- (DJB)
and Technovative Media, Inc.	)	
Plaintiff	)	
v.	)	
Rembrandt 3D Holding Ltd.,	)	
Visual Semiconductor, Inc.,	)	
Mathu Rajan,	)	
<b>Raja Rajan</b> , and	)	
Brown and Michaels, P.C.,	)	
Defendants.	)	

**NOTICE OF MOTION**

**RAJA RAJAN’S MOTION FOR SANCTIONS PURSUANT TO  
BANKRUPTCY RULE 9011, FED. R. CIV. P. 11, 28 U.S.C. § 1927, AND  
THE COURT’S INHERENT AUTHORITY**

TO: All Creditors and Parties in Interest

**PLEASE TAKE NOTICE** that on June 3, 2025 (refiled), Raja Rajan (Defendant in Adversary Action and Unsecured Creditor, (the “Movant”) filed a **MOTION FOR SANCTIONS** (the “Motion”) in the above-captioned Chapter 11 case. The Motion seeks an order from the Court directing the Chapter 11 Trustee, William Homony to be sanctioned and awarding other relief for not having a good faith basis to sue Raja Rajan as to the **adversary action**.

**HEARING ON THE MOTION**

A hearing on the Motion will be held before the Honorable Judge Derek J. Baker, United States Bankruptcy Judge, on:

**Date:** 7/1/2023

**Time:** 1:00

**Location:** Zoom video conference or United States Bankruptcy Court

Eastern District of Pennsylvania

Example: 900 Market Street, Philadelphia, PA 19107

Courtroom No. 2. Or Zoom video conference

### **OBJECTIONS OR RESPONSES**

Any party wishing to oppose the relief requested in the Motion must file a written response with the Clerk of the Bankruptcy Court and serve a copy on the undersigned counsel **at least seven (7) days before the hearing date**, in accordance with Local Bankruptcy Rule 9014-3.

If no response is timely filed and served, the Court may grant the relief requested in the Motion without further notice or hearing.

**Dated:** June 3, 2025

**Respectfully submitted,**

/s/

Raja Rajan, Esquire

Unsecured Creditor and Defendant in

Adversary Proceeding

*Pro Se*

**CERTIFICATE OF SERVICE**

I, Raja Rajan, certify that I caused the filing of the aforementioned and each party in interest was notified by the Court's system.

/s/  
\_\_\_\_\_  
Raja Rajan  
Unsecured Creditor and Defendant in Adversary Action